

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF OKLAHOMA**

AMY GUSTAFSON,

Plaintiff,

v.

Case No. CIV-20-1136-R

ALLSTATE VEHICLE AND PROPERTY
INSURANCE COMPANY, an Illinois
Corporation,

Defendant.

JOINT MOTION FOR AGREED PROTECTIVE ORDER

Plaintiff, Amy Gustafson, and Defendant, Allstate Vehicle and Property Insurance Company, jointly move this Court to enter an Agreed Protective Order. In support, the Parties show the Court as follows:

1. The parties are actively engaged in written discovery and document production in this action.
2. Certain materials have been requested in this case which contain confidential, propriety, and/or trade secret information.
3. The Parties have agreed that such confidential information is deserving of protection against any disclosure or dissemination to anyone except as approved by the Parties.
4. The Parties have agreed to the proposed Agreed Protective Order attached as “Exhibit 1”.

WHEREFORE, the Parties respectfully request this Court's approval and entry of the proposed Agreed Protective Order attached as "Exhibit 1."

Respectfully submitted,

s/ RONALD L. WALKER
RONALD L. WALKER, OBA # 9295
JERRY D. NOBLIN, JR., OBA #20296
TOMLINSON · MCKINSTRY P.C.
Two Leadership Square, Suite 450
211 North Robinson Ave.
Oklahoma City, Oklahoma 73102
ronw@tmoklaw.com
jerryn@tmoklaw.com
Telephone: 405-606-3370
Facsimile: 877-917-1559
Attorneys for Defendant

-and-

s/JACOB L. ROWE
(Signed by filing attorney with permission of attorney)
Simone Fulmer, OBA #17037
Harrison C. Lujan, OBA #30154
Jacob L. Rowe, OBA #21797
Andrea R. Rust, OBA #30422
FULMER SILL PLLC
1101 N. Broadway Ave., Suite 102
Oklahoma City, OK 73103
Telephone: (405) 510-0077
Facsimile: (800) 978-1345
sfulmer@fulmersill.com
hlujan@fulmersill.com
jrowe@fulmersill.com
arust@fulmersill.com

Jim Buxton, OBA #19057
Buxton Law Group
1923 N. Classen Blvd.
Oklahoma City, OK 73106
Telephone: (405) 604-5577
Facsimile: (405) 604-5578
jim@buxtonlawgroup.com
Attorneys for Plaintiff